

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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Postal Rate and Fee Changes, 2001

Docket No. R2001-1

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS VIRGINIA J. MAYES
(NAA/USPS-T23-1-2)
November 16, 2001**

The Newspaper Association of America hereby submits the attached
interrogatories to United States Postal Service witness Virginia T. Mayes (USPS-T-23)
and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all
participants requesting such service in this proceeding in accordance with section 12 of
the Rules of Practice.

November 16, 2001

William B. Baker
William B. Baker

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NAA/USPS-T23-1: Please refer to your testimony at Page 2, lines 9-12 and Appendix B, Table 2, of LR-J-68.

- a. Please confirm that the cost data that you provide to witnesses Moeller and Hope is expressed in cost per pounds.
- b. Please confirm that the cost data that you provide to witnesses Moeller and Hope are not expressed in cost per piece.
- c. If you cannot confirm (b) or (c), please explain why not.

NAA/USPS-T23-2: Please refer to your testimony at Page 4, lines 9-12. Please confirm that the non-transportation cost savings associated with destination entry of Standard Mail are costs of handling mail in bulk (cross-docking) and not costs related to piece handlings. If you cannot confirm, please explain why not.